

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK**

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**IN RE:**

**DAISY RIVERA-RODRIGUEZ**

**Debtor,**

**DAISY RIVERA-RODRIGUEZ**

**Plaintiff,**

**-against**

**AMERICAN EDUCATION SERVICES,**

**Defendant.**

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**SIRS:**

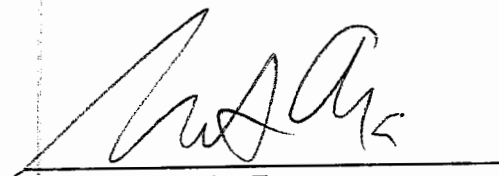
**PLEASE TAKE NOTICE** that upon the attached Affidavit of the Plaintiff, Daisy Rivera-Rodriguez, sworn to on March 12, 2020, and the Affirmation of Steven Candela, Esq., dated March 12, 2020, and upon the complaint in the Adversary Proceeding filed herein, Plaintiff will move before this Court, Hon. Carla E. Craig, USDJ, of the United States Bankruptcy Court, Eastern District of New York, located at 271-C Cadman Plaza E, Room 3529, Brooklyn, New York 11201, on the 7<sup>th</sup> day of April, 2020, at 2:30 p.m., or as soon thereafter as counsel can be heard, for an Order for a Default Judgment against Defendant American Education Services, pursuant to Federal Rule of Civil Procedure §55(b) and Local Rule§55.2, on the ground that Defendant American Education Services, has failed to answer or otherwise move with regard to the Complaint in the Adversary Proceeding, previously filed herein, and that the two (2) student loans owed to Defendant American Education Service, in the amount of **\$62,801.38** be discharged, and for such other and for such other and further relief as this Court deems just and proper.

**Bankruptcy Case No.: 19-44084**

**Adversary Proceeding No.: 19-01128**

**NOTICE OF MOTION**

Dated: New York, New York  
March 12, 2020

A handwritten signature in black ink, appearing to read 'Steven Candela', is written over a horizontal line.

Steven Candela, Esq.  
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